

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA,

*Plaintiff,*

*vs.*

Case No. 23-cr-67

MICHAEL CONNOR,

*Defendant.*

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**UNOPPOSED MOTION TO ADJOURN SENTENCING HEARING**

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Michael Connor, by undersigned counsel, respectfully moves the Court to adjourn the sentencing hearing scheduled for July 29, 2024, by no less than two weeks. Mr. Connor seeks this time to review several hundred pages of material his counsel received today, along with a request for restitution. The restitution is made on behalf of a victim that does not appear to be listed in the Indictment or Presentence Report.

The restitution request was not provided to the United States Probation Office before the PSR disclosure, so the information was not included in the disclosed PSR. *See* 18 U.S.C. §3664(d)(1)-(d)(2). Further, when entering into the plea agreement, the parties contemplated having notice of restitution requests at least 10 days in advance of sentencing. Doc. 43, pg. 9, ¶26. The material counsel received today was provided within only seven days. After conferring with counsel for the government, Megan Paulson, the government has indicated that it's preference would be for a short adjournment as

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opposed to a bifurcated hearing, so the Court could address restitution at the time of sentencing.

Counsel requests no less than a two-week adjournment of the sentencing hearing to review the material, provide a copy to Mr. Connor at Dodge County Jail, conduct research on the matter, and advise Mr. Connor of his options. Mr. Connor may either seek to oppose the restitution on the basis that he is not statutorily required to pay and is not bound to do so by the plea agreement or may choose to agree to the amount the government intends to seek. To come to a decision by the sentencing hearing, Mr. Connor will need more time to review and discuss the matter with his counsel.

The government, by AUSA Megan Paulson is unopposed to this brief adjournment request for the above referenced reasons. Accordingly, Mr. Connor respectfully moves the Court for an Order adjourning his sentencing hearing by no less than two weeks.

Dated at Milwaukee, Wisconsin, this 22th day of July, 2024.

Respectfully submitted,

/s/ Gabriela A. Leija

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